

No. 2022 68763

**HOUSTON SECURED DEVELOPMENT PARTNERS, LLC** : **IN THE DISTRICT COURT OF**  
: :  
: :  
**vs.** : **HARRIS COUNTY, TEXAS**  
: :  
**HSDP BAM, LLC AND** : :  
**JOSEPH JACKSON** : **151ST JUDICIAL DISTRICT**

**NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Defendant by and through their attorney(s) of record: **Mr. Warren Muhammad (Law Office of Warren F. Muhammad)**

You will please take notice that twenty (20) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

**Secured Title of Texas, LLC (Any & All Records)**  
**5151 Katy Freeway, Ste. 210**  
**Houston, TX 77007**

before a Notary Public for **Innovative Legal Solutions, Inc.**  
**5910 Rose Street**  
**Houston, TX 77007**  
**713.658.0802 Fax 713.658.0704**

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

**Exhibit 'A'**

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

**Ms. Mary Alice Parsons**  
**The Parsons Law Firm**  
**4545 Bissonnet St., Suite 104**  
**Bellaire, TX 77401**  
**713-955-4878 Fax 713-589-2454**  
Attorney for Plaintiff  
Email: mary@parsonslawtexas.com  
SBA # 00791409

*Ms. Mary Alice Parsons*  
**Ms. Mary Alice Parsons**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, electronic delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: August 29, 2023

by

A handwritten signature in blue ink, consisting of a large loop at the top and a horizontal line extending to the right, positioned above a solid horizontal line.

13116

**HOUSTON SECURED DEVELOPMENT  
PARTNERS, LLC**

**vs.**

**HSDP BAM, LLC AND  
JOSEPH JACKSON**

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**IN THE DISTRICT COURT OF**

**HARRIS COUNTY, TEXAS**

**151ST JUDICIAL DISTRICT**

**ATTORNEYS OF RECORD:**

Mr. Warren Muhammad  
Law Office of Warren F. Muhammad  
6112 Wheatley Street  
Houston, TX 77091  
800-397-7760 Fax: 713-510-1504

Ms. Mary Alice Parsons  
The Parsons Law Firm  
4545 Bissonnet St., Suite 104  
Bellaire, TX 77401  
713-955-4878 Fax: 713-589-2454

<b>HOUSTON SECURED DEVELOPMENT PARTNERS, LLC</b>	:	<b>IN THE DISTRICT COURT OF</b>
	:	
<b>vs.</b>	:	<b>HARRIS COUNTY, TEXAS</b>
	:	
<b>HSDP BAM, LLC AND JOSEPH JACKSON</b>	:	<b>151ST JUDICIAL DISTRICT</b>

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS**

Custodian of Records for: **Secured Title of Texas, LLC**

Records Pertaining To: **Exhibit 'A'**

Type of Records: **Any and all records, whether typed, handwritten or computer-generated, as described on the attached Exhibit 'A', contained in your files**

1. Please state your full name.

Answer: \_\_\_\_\_

2. Please state by whom you are employed and the business address.

Answer: \_\_\_\_\_

3. What is the title of your position or job?

Answer: \_\_\_\_\_

4. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?

Answer: \_\_\_\_\_

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: \_\_\_\_\_

6. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 4. Have you complied? If not, why?

Answer: \_\_\_\_\_

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations.

Answer: \_\_\_\_\_

8. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: \_\_\_\_\_

9. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: \_\_\_\_\_

10. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: \_\_\_\_\_

11. Was the method of preparation of these records trustworthy?

Answer: \_\_\_\_\_

\_\_\_\_\_  
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

HOUSTON SECURED DEVELOPMENT  
PARTNERS, LLC

vs.

HSDP BAM, LLC AND  
JOSEPH JACKSON

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IN THE DISTRICT COURT OF  
  
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151ST JUDICIAL DISTRICT

**EXHIBIT 'A'**

**Documents to be Produced:**

1. Any and all documents pertaining to the transaction which closed in May 2023 regarding the property located at 3333 Kilgore Street, Houston, Texas 77021, including but not limited to applications, title searches, corporate minutes/resolutions/authorizations, settlement or closing statements, disclosures, conveyance documents, notes, and all funding records including but not limited to records of wire transfers, electronic funds transfers, checks, cashier's checks, receipts, ACH payments, or any other similar documentation, as well as any and all communications including emails, correspondence, telephone messages, and text messages pertaining to each transaction.

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Kim Fisher on behalf of Mary Parsons

Bar No. 791409

CSR4@myinnovative.net

Envelope ID: 79052661

Filing Code Description: Notice

Filing Description: Notice of Intent to take Deposition by Written Questions

Status as of 8/30/2023 8:57 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mary AliceParsons		mary@parsonslawtexas.com	8/30/2023 8:53:38 AM	SENT
Shanna HillMcClain		shanna@parsonslawtexas.com	8/30/2023 8:53:38 AM	SENT
Warren Muhammad	7089500	warren@wfmlawfirm.com	8/30/2023 8:53:38 AM	ERROR
Warren Muhammad	7089500	warren@wfmlawfirm.com	8/30/2023 8:53:38 AM	ERROR
Warren Muhammad	7089500	warren@wfmlawfirm.com	8/30/2023 8:53:38 AM	ERROR